

KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP

WASHINGTON HARBOUR, SUITE 400

3050 K STREET, NW

WASHINGTON, D.C. 20007-5108

(202) 342-8400

NEW YORK, NY

CHICAGO, IL

STAMFORD, CT

PARSIPPANY, NJ

BRUSSELS, BELGIUM

AFFILIATE OFFICES

MUMBAI, INDIA

FACSIMILE

(202) 342-8451

www.kelleydrye.com

DIRECT LINE: (202) 342-8640

EMAIL: dcrock@kelleydrye.com

February 29, 2008

VIA ECFS

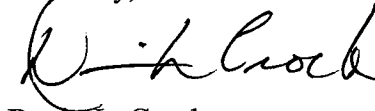
Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

Re: Annual Customer Proprietary Network Information Compliance
Certification; EB Docket No. 06-36

Dear Ms. Dortch:

Please find the attached Annual Customer Proprietary Network Information ("CPNI") Compliance Certification for Momentum Wholesale, LLC. Please feel free to call me if you have any questions regarding this filing.

Sincerely,



Devin L. Crock

Attachment

Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2008

EB Docket 06-36

Date filed:

2/29/2008

Name of company covered by this certification:

Momentum Wholesale, LLC
2700 Corporate Drive Suite 200
Birmingham, AL 35242

Form 499 Filer ID:

826047

Name of signatory:

Charles E. Richardson III

Title of signatory:

Vice President and Secretary

I, Charles E. Richardson III, certify that I am an officer of Momentum Wholesale, LLC (the Company), and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's (FCC) CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the FCC's rules.

The Company has not taken any actions (proceedings instituted or petitions filed by the Company at either state commissions, court systems, or at the FCC) against data brokers in the past year. The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI. Company has no information outside of Commission Docket No. 96-115, or that is not otherwise publicly available (e.g., through news media), regarding the processes pretexters are using to attempt to access CPNI.

Signed



[electronic signature]

1 Attachment

Attachment 1

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Momentum Wholesale, LLC
2700 Corporate Drive Suite 200
Birmingham, AL 35242

Momentum Wholesale, LLC (the Company) is a wholesale provider of voice over Internet protocol (VoIP) telecommunications services to small and medium sized cable companies and municipalities (customers) for resale to their end-user subscribers (subscribers). The Company has established practices and procedures adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, and the Federal Communications Commission's ("FCC") rules pertaining to customer proprietary network information ("CPNI") set forth in sections 64.2001 – 64.2011 of the Commission's rules.

The Company takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, including the authentication of customers prior to disclosing CPNI based on customer-initiated contacts. For example, the Company authenticates customers without the use of readily available biographical information (such as a customer's federal tax id number or the last four digits of that number, a business address, or a date of incorporation), or account information, prior to allowing the customer online access to its subscribers' CPNI related to a subscriber's telecommunications service account. Specifically, the Company authenticates its customer through a password previously mailed to the customer's business address of record with the Company.

Company may negotiate alternative authentication procedures for services that Company provides to business customers that have both a dedicated account representative and a contract that specifically addresses Company's protection of CPNI.

Company trains its supervisory and non-supervisory personnel in an effort to ensure that its employees, in accordance with FCC regulations: (a) understand what CPNI is, (b) join in and carry-out Company's obligation to protect CPNI, (c) understand when they are and when they are not authorized to use or disclose CPNI, (d) obtain customers' informed consent as required with respect to its use for marketing purposes, and (e) keep records regarding receipt of such consent, customer complaints regarding CPNI and the use of CPNI for marketing campaigns.

The Company notifies customers promptly by mail whenever a password, customer response to a backup means of authentication for lost or stolen passwords, online account, or address of record is created or changed. This notification is not provided when the customer initiates service, including the selection of a password at service initiation.

The Company does not share CPNI with third parties for purposes of marketing products or services. The Company does not use CPNI for marketing purposes.

Company discloses and permits access to CPNI where required by law (e.g., under a lawfully issued subpoena).

The Company will report CPNI breaches electronically within 7 days to the US Secret Service and the FBI

through the designated central reporting facility at <https://www.cpnireporting.gov>. Following electronic notification to the designated central reporting facility, the affected customer and subscriber will be promptly notified by mail unless the Company is otherwise instructed by law enforcement.

The Company protects its stored CPNI records via a password protected, secured web site.

Annual 47 C.F.R. § 64.2009(c) CPNI Certification for 2008

EB Docket 06-36

Date filed: 2/29/2008

Name of company covered by this certification: Momentum Telecom, Inc.
2700 Corporate Drive Suite 200
Birmingham, AL 35242

Form 499 Filer ID: 821474

Name of signatory: Charles E. Richardson III

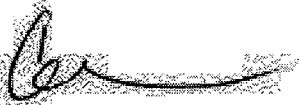
Title of signatory: Vice President and Secretary

I, Charles E. Richardson III, certify that I am an officer of Momentum Telecom, Inc. (the Company), and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's (FCC) CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the FCC's rules.

The Company has not taken any actions (proceedings instituted or petitions filed by the Company at either state commissions, court systems, or at the FCC) against data brokers in the past year. The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI. Company has no information outside of Commission Docket No. 96-115, or that is not otherwise publicly available (e.g., through news media), regarding the processes pretexters are using to attempt to access CPNI.

Signed



[electronic signature]

1 Attachment